

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF VIRGINIA
NORFOLK DIVISION

In Re: Eunice Johnson Thrower,
Debtor

Case No.: 10-70514-FJS
Chapter 13

NOTICE OF MOTION TO INCUR NEW DEBT

The Debtor has filed papers with the Court to Incur New Debt.

Your rights may be affected. You should read these papers carefully and discuss them with your Attorney, if you have one in this case. (If you do not have an Attorney, you may wish to consult one.)

If you do not want the Court to grant the Relief requested, or if you want the Court to consider your views on the Motion then, on or before 21 days from service of this Motion, you or your Attorney must file with the Court, at the address shown below, a written response pursuant to Local Bankruptcy Rules 4001(a)-1(C) and 9013-1(H). You must mail your response to the Court for filing.

Clerk of Court
United States Bankruptcy Court
600 Granby Street, Fourth Floor
Norfolk, VA 23510

You must also mail a copy to:

Steve C. Taylor
Law Offices of Steve C. Taylor, P.C.
133 Mount Pleasant Road
Chesapeake, VA 23322

Michael P. Cotter
Chapter 13 Trustee
870 Greenbrier Pkwy., Suite 402
Chesapeake, VA 23320

If you or your Attorney do not take the above step(s), the Court may decide you do not oppose the relief sought in the motion and may enter an Order granting the Motion without further notice or hearing.

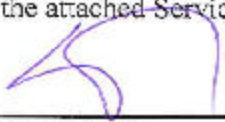
Date: March 28, 2013


Steve C. Taylor

Steve C. Taylor, Esq.
VSB#: 31174
Law Offices of Steve C. Taylor, PC
133 Mt. Pleasant Rd.
Chesapeake, VA 23322
(757) 482-5705
Attorney for the Debtor

CERTIFICATE OF SERVICE

I certify that on this 28th day of March, 2013, I mailed a copy of the foregoing Motion to Incur New Debt, to the creditors and parties in interest on the attached Service List in compliance with Fed.R.Bankr.P. 7004. Insured depository institutions have been served via certified mail addressed to the officer named on the attached Service List. All other parties have been served via first class mail addressed as shown on the attached Service List.



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MOTION TO INCUR NEW DEBT

COMES NOW Eunice Johnson Thrower, the Debtor by Counsel, and moves the Court for authority to incur indebtedness and in support thereof states as follows:


1. Debtor(s) filed her Chapter 13 Bankruptcy proceedings in this Court on February 6, 2010.
2. Debtor(s) filed her Amended Chapter 13 Plan on May 21, 2010, and it was confirmed on July 15, 2010.
3. Debtor(s) desire to incur new indebtedness, the terms of which are as follows:
 - a. A new vehicle, namely a 2013 Nissan Rogue, in the amount of \$19,621.62.
 - b. This loan is for the purpose of purchasing a new vehicle so that the Debtor wife will have reliable and dependable transportation after her 2005 Mazda Tribute was totaled in an accident.
 - c. The terms of the new vehicle loan are as follows: Amount to be financed with Prestige Financial, Assigned without recourse with Charles Barker Nissan, is \$19,621.62 at 17.99% interest with 72 monthly payments in the amount of \$450.76 beginning April 26, 2013. The Debtor has paid \$7,000.00 as a down payment, from insurance proceeds received from the totaled Mazda, in addition to a \$2,000.00 consumer rebate.
 - d. To afford this new indebtedness the Debtor will use funds from reduced contingency, miscellaneous and recreation expenses.
4. The Debtor believes that incurring the new indebtedness is necessary and proper, that she is able to repay the indebtedness upon the terms set forth above, that the Debtor will be able to conclude her Plan without default, and that the purpose for incurring the new indebtedness is so that the Debtor wife will have reliable and dependable transportation after her 2005 Mazda Tribute was totaled in an accident.

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5. The Debtor will file Amended Schedules and an Amended Chapter 13 Plan within 21 days of entry of the Order related to this Motion.

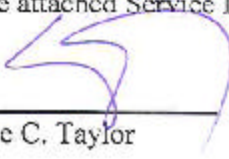
WHEREFORE, the Debtor respectfully requests that her Motion to Incur Indebtedness be granted as requested for the purposes described above.

RESPECTFULLY SUBMITTED,


By: _____
Counsel for Debtor

CERTIFICATE OF SERVICE

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Attorney for the Debtor

CREDITOR MAILING MATRIX

American General Finance
c/o Frederick Geissinger, CEO
601 NW 2nd Street
Evansville, IN 47708-1013

American General Financial Srv
4300 Portsmouth Blvd #178
PO Box 9326
Chesapeake, VA 23321-0000

Amoco Oil
c/o LVNV
POB 10587
Greenville, SC 29603-0587

BP (notice)
Robert Dudley, CEO
501 Westlake Park Blvd.
Houston, TX 77079-0000

Citi Financial
3325 Taylor Road
Ste. 114
Chesapeake, VA 23321-0000

Citi Mortgage
PO Box 183040
Columbus, OH 43218-0000

Citibank, NA (notice)
Michael Corbett, CEO
701 E. 60th St. N.
Sioux Falls, SD 57104-0000

Citifinancial (notice)
CT Corp. Sys., Reg. Ag.
4701 Cox Rd., Ste. 301
Glen Allen, VA 23060-6802

DCSE (notice)
Martin D. Brown, Commissioner
2001 Maywill St., Suite 104
Richmond, VA 23230-0000

DCSE (notice)
Martin D. Brown, Commissioner
801 E. Main St.
Richmond, VA 23219-2901

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Dell Financial (notice)
c/o Michael Dell, CEO
1 Dell Way Round Rock
Round Rock, TX 78682-0000

Dell Preferred Account
Payment Processing Center
PO Box 6403
Carol Stream, IL 60197-0000

Department of Treasury
Financial Management Service
Birmingham, AL 35283-0000

Department of Treasury
Financial Management Services
PO Box 1686
Birmingham, AL 35201-0000

Department of Treasury-notice
1500 Pennsylvania Ave. NW
Washington, DC 20220-0000

Division of Child Support
Bankruptcy Unit
2001 Maywill Street, Ste 104
Richmond, VA 23230-3236

Division of Child Support
730 E. Broad St, 4th Fl
Richmond, VA 23219-1836

HSBC (CERT)
Stuart Gulliver, CEO
One HSBC Center
Buffalo, NY 14203-0000

HSBC Bank (RA)
CT Corporation System
4701 Cox Rd Ste 301
Glen Allen, VA 23060-6802

HSBC Credit Services
P.O. Box 60118
City of Industry, CA 91716-0118

Macy's Northeast, Inc (notice)
Edward R. Parker, Reg. Agent
5511 Staples Mill Road
Henrico, VA 23228-0000

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Macy's Visa
P.O. Box 699194
Des Moines, IA 50368-9194

Macy's Visa
P.O. Box 689194
Des Moines, IA 50368-9194

Macys
P.O. Box 689195
Des Moines, IA 50368-9195

Mazda American Credit
Dept. 193901
PO Box 55000
Detroit, MI 48255-1939

Mazda American Credit (notice)
Andrew L. Menzyk, President
9009 Carothers Pkwy.
Franklin, TN 37067-0000

National Bankruptcy Service Ct
P.O. Box 537901
Livonia, MI 48153-0000

Sam's Club
P.O.Box 530942
Atlanta, GA 30353-0942

Sam's Club (notice)
Rosaland Brewer, Pres/CEO
2101 SE Simple Savings Dr.
Bentonville, AR 72716-0745

Wells Fargo
3201 North Fourth Avenue
Sioux Falls, SD 57104-0000

Wells Fargo (notice-FDIC)
John G. Stumpf, CEO
420 Montgomery Street
San Francisco, CA 94104-0000

Wyndham Vacation Resorts (RA)
Corp. Creations Network Inc
4445 Corporation Lane, 2nd Fl.
Virginia Beach, VA 23462-0000

Wyndham Vacation Resorts, Inc.
P.O. Box 96204
Las Vegas, NV 89193-6204

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